From: Ron Eglinton <R.Eglinton@cityofadelaide.com.au>

Sent: Friday, 21 July 2017 4:05 PM

To: powersandimmunities

Subject: Attn Director, Construction Policy - Submission for proposed changes to the

telecommunications act

Director, Construction Policy
Department of Communication and the Arts

City of Adelaide Council wish to make a submission on the Proposed Amendments to Telecommunications Powers and Immunities

We agree with and support the comments made in the submission from the Australian Local Government Association ALGA

In addition we would oppose the change 17

17. Clarify requirements for joint venture arrangements

Proposal—Tel Code, Section 1.4(4)

If adopted, this amendment to the Tel Code would clarify that for unincorporated joint venture arrangements where two or more carriers are installing or upgrading facilities, only one carrier's signature is required on relevant documentation.

Our reasoning being that multiple signatures is an internal efficiency issue that could be managed by the Carriers involved with good prior planning. It is not clear if the single signatory has absolute authority and acts as single point of contact with responsibility for all aspects of a project as it evolves, and does not leave us with an appropriate contact once the project is complete. As a project progresses we receive LAAN notices from each team that is involved including sub-contractors and they are often located at different centres in different states. The subcontractors' teams often have no direct relationship with the project initiators. Joint ventures have been known to fail or change so the original signatory may not have final responsibility.

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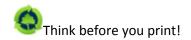
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